

Certificate of Notice Page 1 of 4
United States Bankruptcy Court
Eastern District of Pennsylvania

In re:
Samuel M. Cavanagh
Ginalouise Cavanaugh
Debtors

Case No. 18-16299-amc
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0313-2

User: Stacey
Form ID: pdf900

Page 1 of 1
Total Noticed: 4

Date Rcvd: Dec 11, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 13, 2018.

db/jdb +Samuel M. Cavanagh, Ginalouise Cavanaugh, 1923 E. Moyamensing Avenue,
Philadelphia, PA 19148-2526

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
smg E-mail/Text: megan.harper@phila.gov Dec 12 2018 03:06:25 City of Philadelphia,
City of Philadelphia Law Dept., Tax Unit/Bankruptcy Dept, 1515 Arch Street 15th Floor,
Philadelphia, PA 19102-1595

smg E-mail/Text: RSVVCBICNOTICE1@state.pa.us Dec 12 2018 03:06:04
Pennsylvania Department of Revenue, Bankruptcy Division, P.O. Box 280946,
Harrisburg, PA 17128-0946

smg +E-mail/Text: usapae.bankruptcynotices@usdoj.gov Dec 12 2018 03:06:14 U.S. Attorney Office,
c/o Virginia Powel, Esq., Room 1250, 615 Chestnut Street, Philadelphia, PA 19106-4404
TOTAL: 3

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 13, 2018

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 11, 2018 at the address(es) listed below:

BRAD J. SADEK on behalf of Debtor Samuel M. Cavanagh brad@sadeklaw.com, bradsadek@gmail.com

BRAD J. SADEK on behalf of Joint Debtor Ginalouise Cavanaugh brad@sadeklaw.com,
bradsadek@gmail.com

REBECCA ANN SOLARZ on behalf of Creditor Freedom Mortgage Corporation bkgroup@kmlawgroup.com

TERRY P. DERSHAW td@ix.netcom.com, PA66@ecfcbis.com;7trustee@gmail.com

United States Trustee USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 5

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GINALOUISE CAVANAGH
SAMUEL M. CAVANAGH

Debtors

FREEDOM MORTGAGE CORPORATION
Movant

vs.

GINALOUISE CAVANAGH
SAMUEL M. CAVANAGH

Debtors

TERRY P. DERSHAW ESQUIRE

Trustee

CHAPTER 7

NO. 18-16299 AMC

11 U.S.C. Section 362

STIPULATION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

The Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Reform Act of 1978 (The Code) 11 U.S.C. Section 362, is modified and annulled to allow FREEDOM MORTGAGE CORPORATION, its successor and/or assigns in title to proceed with having the Sheriff's Deed recorded, as well as securing the property, maintaining the property, removing the personal property and proceeding with any potential ejectment action as to the premises located at 3850 Anne Street, Drexel Hill, PA 19026.

IT IS FURTHER STIPULATED AND VOLUNTARILY AGREED THAT:

1. The recitals are incorporated herein and made a part hereof;
2. A Sheriff's Sale occurred on September 21, 2018 for the Property located at 3850 Anne Street, Drexel Hill, PA 19026 ("the Property").
3. At the Sheriff's Sale, the Property was sold to Freedom Mortgage Corporation ("Movant").

4. Debtors agree that the Property is not a part of the Bankruptcy Estate, as established by the fact that the Property is not listed in the Debtor's schedules.

5. Debtors agree that Movant may complete the recording of the Sheriff's Deed from the September 21, 2018 Sheriff's Sale and will not be in violation of the automatic stay.

6. Debtors agree that they are not currently occupying the Property and do not intend to occupy the Property.

7. Debtors agree that the Movant, its successors, assigns and/or agents may secure and/or perform any work needed on the property to avoid City/Borough Code Violations and any such action will not be in violation of the automatic stay.

8. Debtors hereby waive and relinquish any and all interest, claim or rights they may have, or may have had, in the Property as well as the personal belongings left at this Property on or after December 14, 2018.

9. Debtors understand that said personal belongings will be considered abandoned on or after December 14, 2018.

10. Debtors agree, that the Movant and/or its assigns, successors and/or agents, on or after the date the Stipulation is approved by the Court, may immediately remove and dispose of any and all personal property in or around the Property as it chooses.

11. Debtors agree that Movant, its successors and/or assigns may file all pleadings necessary to effectuate an ejectment action, including, but not limited to, having a lock out performed and such actions will not be in violation of the automatic stay.

12. Debtors declare and represent that no promise, inducements or agreements not herein expressed have been made to them.

13. Further bankruptcy filings by either or both Debtors for a period of one hundred eighty (180) days hereof will not prevent Movant from proceeding with recording of the Sheriff's Deed or any actions as set forth in this stipulation.

14. The Parties agree, that the stay provided by Bankruptcy Rule 4001(a)(3) has been waived.

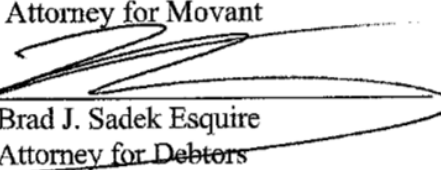
15. This Stipulation represents the totality of the agreement between the parties.

16. Any modifications, retractions or revisions must be in writing and signed by all parties.


Date: 12/3/18

/s/Rebecca A. Solarz, Esq.
Rebecca A. Solarz, Esquire
Attorney for Movant

Date: 12/3/18


Brad J. Sadek Esquire
Attorney for Debtors

Approved by the Court this 11th day of December, 2018. However, the court retains discretion regarding entry of any further order.



THE HONORABLE ASHELY M. CHAN
United States Bankruptcy Court Judge